



**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

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Application of PACIFIC GAS AND
ELECTRIC COMPANY, a California
corporation, for a Permit to Construct the
Moraga-Oakland X 115 kV Rebuild Project
Pursuant to General Order 131-D.

Application No. 24-11-_____

(U 39 E)

**APPLICATION OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)
FOR A PERMIT TO CONSTRUCT THE MORAGA-OAKLAND
X 115 KV REBUILD PROJECT**

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Dated: November 15, 2024

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Pursuant to Section IX(B) of General Order (“GO”) 131-D and Rules 2.1 through 2.5 and 3.1 of the California Public Utilities Commission’s (“Commission” or “CPUC”) Rules of Practice and Procedure, Pacific Gas and Electric Company (“PG&E”) respectfully requests a Permit to Construct (“PTC”) the Moraga-Oakland X 115 kV Rebuild Project (“project”) to rebuild the existing Moraga-Oakland X 115 kV line by replacing approximately four miles of two overhead parallel double circuit 115 kV power lines in place and undergrounding approximately one mile of two parallel double circuit 115 kV power lines to better serve the Oakland area.

I. PROJECT OVERVIEW

The Moraga-Oakland X 115 kV power line is a four circuit 115 kV power line that runs between Moraga Substation in Orinda, Contra Costa County, California over the Oakland Hills south of State Route 24 and to Oakland X Substation in Oakland, Alameda County, California. The line is part of a local 115 kV system that delivers power to approximately 200,000 customers, including large industrial customers like the Port of Oakland.

PG&E’s Moraga-Oakland X 115 kV Rebuild project proposes to rebuild the existing Moraga-Oakland X 115 kV power lines. The project will conduct critical life cycle maintenance and provide important system reliability and wildfire safety improvements. The project will

replace structures that are around 100 years old with modern equipment that meet reliability and safety requirements in a mix of overhead and underground orientations. Replacing the existing conductor will provide capacity to accommodate the region's reasonably foreseeable future energy demands. The current estimated cost at completion is approximately \$276.8 million.

The rebuild of the Moraga-Oakland X 115 kV power lines was reviewed by California Independent Systems Operator ("CAISO") in its 2019-2020 Transmission Planning Process ("TPP") as one of the North Oakland Area Reinforcement scopes. CAISO concurred that the proposed project was primarily driven by GO 95 compliance and maintenance needs and would be performed under PG&E's maintenance budget. The scope reviewed by CAISO included rebuilding with only three of the four Moraga-Oakland X 115 kV power lines. However, Moraga-Oakland X 115 kV rebuilt with only three lines would not be able to meet reasonably foreseeable capacity needs of the region. Therefore, PG&E rescoped the project to include all four lines. PG&E plans to submit the revised project to the CAISO in the 2024-2025 TPP.

Moraga-Oakland X 115 kV is approximately five miles long, spanning between Moraga Substation and Oakland X Substation. The project is divided into three sections: the eastern, central, and western sections. The sections are described separately because of their distinct terrain, features, and constructability concerns. The eastern section begins at Moraga Substation and runs through primarily undeveloped, conserved parks lands in Orinda and unincorporated Contra Costa County to the crest of the Oakland Hills at Manzanita Drive, Oakland. The central section proceeds down the western face of the Oakland Hills through the Montclair neighborhood, along Shepherd Canyon Road to State Route 13. The western section begins at the State Route 13 crossing, passes through Dimond Canyon Park and through the southeast corner of Piedmont and into the flatter, densely residential Glenview and Trestle Glen neighborhoods, ending at Oakland X Substation.

In the eastern and central sections, the proposed project will replace approximately four miles of the existing Moraga-Oakland X 115 kV power lines overhead within the same alignment. In these sections, PG&E will remove forty-one existing aged towers and replace

them with thirty-four new electric structures. Seven structures will be removed and not replaced. Eight recently replaced structures will be modified and retained. In the western section of the project, PG&E proposes to remove twenty-seven structures and replace them with twelve structures and approximately one mile of underground power line within Park Boulevard, Oakland. The eastern overhead to underground transition will occur near the intersection of Park Boulevard and Estates Drive, Piedmont with four transition structures. The western underground to overhead transition will occur adjacent to Oakland X Substation with three transition structures.

The existing conductors have a summer emergency rating of approximately 406 amperes (amps) and will be replaced with conductors with a summer emergency rating of 1,212 amps. All three sections will include a telecommunication line. Minor modifications will occur at both substations. At Moraga Substation, two 115 kV air disconnect switches and two 115kV circuit breakers will be replaced with equipment of the same rating. At Oakland X Substation, three 115 kV circuit breakers and one 115 kV bus will be replaced. The circuit breakers will be replaced with equipment of the same rating, and the existing 703-amp bus will be replaced with a bus rated at approximately 1,181 amps. The system protection scheme likely will be replaced at both substations.

II. REGIONAL CONTEXT AND PROJECT COMPONENTS

A. Regional Context

1. Existing Regional Electric System

The Moraga-Oakland X 115 kV line is part of a regional interconnected network of 115 kV power lines and 115 kV substations in the North Oakland area. Power is supplied from Moraga and Sobrante substations. The 115 kV system delivers power to six PG&E distribution substations which serve approximately 200,000 customers. Of those customers, 90% are residential accounts. Service is also provided to the cities of Oakland, Piedmont, Berkeley, Emeryville, and Alameda as well as unincorporated Contra Costa County and major industrial

customers like the Schnitzer Steel plant, the City of Alameda's Cartwright Substation, and the Port of Oakland. The Port of Oakland, in turn, owns a municipal electric utility that serves electricity to major industrial and commercial customers, including Oakland International Airport and the majority of the Oakland Seaport.

The existing Moraga-Oakland X 115 kV power lines consist of two parallel double circuits, meaning each structure has two circuits, and is approximately 5 miles long beginning at Moraga Substation and terminating at Oakland X Substation. The Moraga-Oakland X 115 kV Circuits 1 and 2 were built in 1908 and Moraga-Oakland X 115 kV Circuits 3 and 4 were built in 1931. All four circuits are ready to be replaced. Two existing structures on the lines support third party AT&T mobile phone antenna. The existing lines are supported by seventy-five structures, representing a mix of four types of existing structures: lattice steel tower (LST), lattice steel pole (LSP), tubular steel pole (TSP), and light-duty steel pole (LDSP). The existing towers are between 53 and 142 feet tall. The existing power lines and towers are neutral in color. The existing lines each have a summer emergency rating of approximately 406 amperes (amps). The Moraga-Oakland X 115 kV system includes no distribution under build, renewable energy, or energy storage components.

Moraga Substation is located the City of Orinda on Lost Valley Drive near Don Gabriel Way. It occupies approximately 16 acres. It holds 230 kV and 115 kV facilities including the easternmost spans of the project lines, telecommunication and supervisory control and data acquisition ("SCADA") facilities, a small retention basin, and areas for parking, storage, or laydown in the open-air fenced substation. Oakland X Substation is located within the City of Oakland on Park Boulevard near I-580. It occupies approximately 1.5 acres. The substation's 115 kV facilities, telecommunication facilities, and SCADA facilities are contained within a reinforced concrete building constructed in 1908. Adjacent to the building, within the fenced substation, are areas for parking, storage, or laydown. Additionally, there is a separate fenced area which currently holds a non-project shoo-fly pole and the westernmost spans of the project power lines.

B. Project Components

The project includes replacing, removing, or modifying existing structures and replacing conductors along the approximately five-mile Moraga-Oakland X 115 kV power line. The project includes the following major components:

1. Aboveground Power Line

The aboveground power line sections of the project will begin with the construction of replacement structures along the existing right of way. The project will include the installation of forty-six new replacement structures. Replacement structures are expected to be a mix of LST, LSP, TSP, and transition structures. The type of structure will be based upon site specific conditions and needs. The design will be based upon current regulatory requirements and industry standards for new structures. New structures will be between 63 and 168 feet tall.

Along the Moraga-Oakland X 115 kV alignment, eight structures that have been replaced within the last 10 years will be retained with modifications to meet new engineering standards and to accommodate the larger conductor. Twenty-two structures along the project will be removed and not replaced. This includes the removal of fifteen structures in the western section where the project proposes to underground the lines. Seven additional structures in the central and eastern sections were eliminated from the project design, allowing for reduced impacts from construction and operations and maintenance. The fifty-one replacement structures include the installation of seven transition structures where the lines transition between overhead and underground. These structures will be near the Estates Drive and Park Boulevard intersection at the border of Piedmont and Oakland, and at Oakland X Substation.

The conductor on the Moraga-Oakland X 115 kV power lines will be replaced as part of the project. The project proposes to install conductor with a summer coastal emergency rating of approximately 1,212 amps. The project will also include installation of a static ground wire to provide grounding to the lines and an optical ground wire (“OPGW”) to augment the existing communication system between Moraga and Oakland X substations. The communication line and grounding will continue within the underground portion. AT&T telecommunication

equipment located on two existing structures will be removed by AT&T and could be relocated to another AT&T location. Once all existing overhead line components are no longer needed and all new overhead and underground components are functional, the existing conductors will be removed, followed by the towers.

2. Underground Power Line

The underground components of the rebuilt Moraga-Oakland X 115 kV power lines will require the installation of vaults, duct banks, and a cable system in city streets through open trench construction. Circuits 1 and 2 will transition to underground at transition structures northwest of the intersection of Estates Drive and Park Boulevard. Circuits 3 and 4 will transition to underground at transition structures on the south side of Park Boulevard near Estates Drive. The lines will continue in two, separate double duct banks in Estates Drive, Park Boulevard, and Park Boulevard Way to Oakland X Substation.

Each of the two duct banks will use 10-inch DR11 high-density polyethylene (“HDPE”) conduits, one for each circuit. Each duct bank will be approximately 4 feet wide. The conduits will be placed on sandbags and will be encased in a thermal concrete casing at least 1.5 feet thick. The concrete casing will be covered by a non-bonding agent/barrier. The space between the agent/barrier and the road surface will consist of a fluidized thermal backfill. The underground 115 kV cable will be copper cross-linked polyethylene (“XLPE”) triplex type. This consists of three XLPE-insulated copper conductors, one conductor per phase, manufactured in a helical, unitized construction with integrated ground continuity conductor and distributed temperature-sensing fiber optics.

Vaults are located where sections of the underground cable line lengths are pulled through the duct banks and spliced together during construction. Each vault is approximately 22 feet by 12 feet and 10 feet tall. Average spacing of vaults is expected to be approximately 1,250 feet or less. Approximately five to ten vaults are expected to be installed for each of the two duct

banks. Two 115 kV circuits' cables will be spliced in each vault. For safety, cable splices will be constructed inside of explosion-proof housings.

Fiber optic lines for system protection and telecommunication will be installed in two 4-inch-diameter DR11 HDPE conduits within each duct bank and between the two electric conduits. A telecommunication vault (approximately 4 feet wide by 6 feet long at least 3 feet deep) will be installed within approximately forty feet of each power line splice vault.

Once construction is completed, the duct bank will be under the surface of the restored roadway and will not be visible. Each of the power line splice vaults will have three utility access covers that are level with the adjacent road surface. Each telecommunication vault or box has a box cover made of two lids that are installed level with the adjacent road surface.

3. Substation Modification

Both Moraga Substation and Oakland X Substation will undergo minor modification as part of the project to align with the rebuilt lines. Modification is expected to include replacing 115 kV substation components and updating system protection schemes, including telecommunication upgrades. At Moraga Substation, two existing 115 kV circuit breakers and two existing 115 kV air switches will be replaced with new 115 kV circuit breakers and air switches. The overhead spans of the project lines entering Moraga Substation will be reconducted. At Oakland X Substation, three 115 kV circuit breakers and one 115 kV bus will be replaced. The 115 kV circuits will be replaced with circuits breakers of the same rating. The current bus is rated for approximately 703 amp and will be replaced bus rated for approximately 1,181 amp. At both substations, within the existing control enclosures, telecommunication equipment will be modified to connect with the new telecommunication path. At Oakland X Substation, the existing Moraga-Oakland X 115 kV lines will be removed from the line terminals of the substation building exterior and replacement lines will be connected after transitioning from underground on three new transition structures. Neither substation will expand from its

current footprint, no transformer banks will be added or modified, and the substations will not change rating.

4. Temporary Structures

a. Guard Structures and Shoo-Fly Poles

The project will include structure replacement, removals, and reconductoring over State Route 13 and numerous city streets and pedestrian trails. To prevent conductors from falling to the ground during construction, temporary guard structures will be installed at certain points for safety of the public. Most of these structures will be two temporary, direct-buried poles placed adjacent to one another, connected with a horizontal pole used as a beam. Some structures will have netting strung between them to provide additional protection. At some locations, bucket or line trucks may be used in lieu of poles, as conditions dictate. At other locations, flaggers or traffic control will be used rather than guard structures.

A temporary shoo-fly may be used to keep existing power lines suspended while a replacement structure is being installed or an existing structure is removed. A shoo-fly is created by temporarily relocating existing lines to one or more light-duty steel or wood poles to allow work to occur on the structure being removed or replaced.

b. Work Areas and Access Routes

Removing, assembling, and installing structures will require work areas of 100 to 200 feet square at the base of each structure to accommodate framing and setting. Where terrain and available work space require, cranes may be used to lift partially framed structures into place. The crane needs approximately a 32 by 40 feet work areas to extend outriggers. Pulling the lines and installing temporary guard structure will also require work areas. Approximately 6 pull sites are anticipated. The exact locations of these pull sites will be determined just prior to construction and will be sited to avoid impacts to the greatest extent feasible. While grading is not anticipated at most work locations, some limited leveling and filling may occur as needed. Vegetation removal is anticipated to prepare some of the work areas.

Undergrounding work areas will require excavation to install vaults, duct banks, and conduit. Each vault will require an excavation area of 42 feet long by 18 feet wide by 13 feet deep. Open trench excavations between vaults are expected to be about 100 to 300 feet long at any one time. Exact trench length and speed of construction will depend on soil conditions, underground utilities, and other considerations. Vegetation removal is anticipated where vault and duct bank construction will impact tree root zones and to allow access.

Construction vehicles are anticipated to access work areas using existing access routes currently used for operation and maintenance. Flatbed trucks are expected to deliver construction materials to site.

c. Staging Areas

Temporary staging areas will be used for a variety of purposes, including storing construction materials and equipment, parking vehicles and equipment, meeting areas, and as conductor pull and tension sites. Project related construction activities will be supported by approximately twenty-one potential staging areas totaling approximately sixteen acres. It is anticipated that these will be located within 2 miles of the project. They may include existing PG&E facilities or other locations currently used for staging. Exact locations will be identified after project approval when a construction contractor is selected. Preparation of these sites is anticipated to require some amount of vegetation removal. Where the sites are not paved, site preparation such as blading, soil compaction, and spreading of rock or gravel may be required.

d. Helicopter Work

Within the eastern section of the project, PG&E will use helicopters to support certain construction activities, including stringing conductor and replacing structures. This will avoid extensive ground disturbance and reduce the need to improve or create access roads. Helicopter landing zones will be sited at staging areas in the eastern section of the project to the extent feasible or will use nearby airports or landing strips.

III. THE APPLICANT

PG&E is, and since October 10, 1905, has been, an operating public utility corporation organized under California law. It is engaged principally in the business of furnishing electric and gas services in California. PG&E's principal place of business is 300 Lakeside Drive, Oakland, California 94612.

Communications with regard to this Application should be addressed to:

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A certified copy of PG&E's Amended and Restated Articles of Incorporation, effective as of June 22, 2020, is on record before the Commission in connection with PG&E's A.20-07-002, filed with the Commission on July 1, 2020. These articles are incorporated herein by reference pursuant to Rule 2.2 of the Commission's Rules.

PG&E's most recent Proxy Statement dated April 4, 2024, was filed with the Commission on May 15, 2024, in A.24-05-009, and is incorporated herein by reference. PG&E's balance sheet and an income statement for the three months ended June 30, 2024, was filed with the Commission on September 6, 2024, in A.23-12-014, and is incorporated herein by reference.

IV. ADDITIONAL INFORMATION REQUIRED BY SECTION IX(B) OF GO 131-D:

Pursuant to Rule 2.4 (b) of the Commission's Rules of Practice and Procedure, PG&E has submitted a Proponent's Environmental Assessment ("PEA"), which is attached as Exhibit B to this Application. The following information is required by Section IX.B of GO 131-D:

- a. *A description of the proposed power line and substation facilities, including the proposed power line route; proposed power line equipment, such as tower design and appearance, heights, conductor sizes, voltages, capacities, substations, switchyards, etc., and a proposed schedule for authorization, construction, and commencement of operation of the facilities.*

A detailed description of the proposed project, including the alignment, proposed equipment, and project components is contained in Section II.B above and in Chapter 2 of the PEA, Exhibit B. A Preliminary Project Schedule is attached as Exhibit C to this Application.

- b. *A map of the proposed power line routing or substation location showing populated areas, parks, recreational areas, scenic areas, and existing electrical transmission or power lines within 300 feet of the proposed route or substation.*

A project map showing the proposed power line route location, substation locations, populated areas, parks, recreational areas, scenic areas and existing electric transmission and power lines within 300 feet of the project is attached as Exhibit A. A map of land use and zoning is provided in Chapter 5 of the PEA, Exhibit B (see Figure 5.11-1, zoning and 5.11-2, land use).

- c. *Reasons for adoption of the power line route or substation location selected, including comparison with alternative routes or locations, including the advantages and disadvantages of each.*

Pursuant to GO 131-D, Section IX(A)(1)(e), PG&E has included a discussion of the alternatives it considered in Chapter 4 and Chapter 6 of the PEA (Exhibit B). That discussion evaluates the advantages and disadvantages of the considered alternatives and provides the reasons for adoption of the route selected.

- d. *A listing of the governmental agencies with which proposed power line route or substation location reviews have been undertaken, including a written agency response to applicant's written request for a brief position statement by that agency. (Such listing shall include The Native American Heritage Commission, which shall constitute notice on California Indian Reservation Tribal governments.) In the absence of a written agency position statement, the utility may submit a statement of its understanding of the position of such agencies.*

PG&E provides the following summary information regarding the government agencies with which PG&E has reviewed the proposed project. A detailed description of the consultation that occurred is contained in Chapter 2 of the PEA.

Native American Heritage Commission

On December 1, 2023, the PG&E team sent a request form with the project description and a map depicting the area of direct impact (“ADI”) to the Native American Heritage Commission (“NAHC”) to request a search of their Sacred Lands File to identify Native American cultural resources that might be affected by the project. On December 4, 2023, the NAHC responded with negative results. The NAHC also provided a list of twenty-five Native American individuals and organizations who may have additional information about tribal cultural resources within the ADI. On January 9, 2024, letters were sent to these contacts with a map of the proposed project and inviting comments or questions. A tabular summary of outreach efforts and results is provided in Table 5.18-1, Exhibit B. No concerns regarding the project have been expressed to date.

California Department of Fish and Wildlife

In March 2020, PG&E met with California Department of Fish and Wildlife (“CDFW”) to discuss the proposed project, power line route options, and to request information about species and habitats around the proposed power line route. CDFW staff thought that impacts to species and habitat would be less if the power lines were replaced overhead. PG&E and CDFW also discussed the conservation easement which covers a portion of the eastern section of the project. The Wildlife Heritage Foundation (“WHF”) holds the conservation easement, with CDFW, United States Fish and Wildlife Service (“USFWS”), the United States Army Corps of Engineers (“USACE”), and the Regional Water Quality Control Board, San Francisco Bay Region (“Water Board”) beneficiaries and approvers of the associated management plans. It was also CDFW’s opinion that undergrounding or changing the alignment in the eastern section was not envisioned by the conservation easement and may be in conflict with conservation values.

Changes to the alignment may require amendments to the conservation easement and management plans, and approval by CDFW, USFWS, the Water Board, USACE, State of California Attorney General, WHF, and other third-party beneficiaries. CDFW expressed no concerns regarding the proposed project to date.

United States Fish and Wildlife Service

In March 2020, PG&E met with USFWS to discuss the proposed project, power line route options, and to request information about species and habitats around the proposed power line route. PG&E and USFWS also requested information on the project's compatibility with the conservation easement discussed above. USFWS staff thought that impacts to species and habitat would be less if the power lines were replaced overhead. No concerns regarding the proposed project have been expressed to date.

Contra Costa County

In August 2020 and November 2024, PG&E met with Contra Costa County staff members in the Community Development, Public Works, and Building departments. The meetings focused on project elements, power line route options, plans for communication to the public, and coordination with Contra Costa County. No conflicts or concerns were communicated to PG&E about the proposed project. PG&E formally requested a position statement in November 2024 but has not yet received a written response.

City of Orinda

In January 2020, July 2020, and November 2024, PG&E met with City of Orinda staff members from the City Manager, Planning, and Public Works departments to discuss the project. The meetings focused on project elements, power line route, the feasibility of undergrounding the power lines in the eastern section of the project, plans for communication to the public, and coordination with the City of Orinda. No conflicts or concerns were communicated to PG&E about the proposed project. PG&E formally requested a position statement in November 2024 but has not yet received a written response.

City of Oakland

In January 2020, March 2020, May 2023, and November 2024, PG&E met with City of Oakland staff members from the Public Works, Transportation, Electrical Services and Construction, Parks, Recreation and Youth Development, and Planning and Building departments to discuss the project. City of Oakland staff provided feedback about compatibility of city streets with undergrounding, highlighted the proximity of schools to the power line route options, informed PG&E of future roadway redesigns, and indicated support for removing structures in the western section of the project. Beyond identifying future road work, no conflicts or concerns were communicated to PG&E about the proposed project. PG&E formally requested a position statement in November 2024 but has not yet received a written response.

City of Piedmont

In February 2020, August 2020, and October 2024, PG&E met with City of Piedmont City Administrator, Fire Chief, and Planning and Public Works departments to discuss the project. The meetings focused on project alternatives with an emphasis on wildfire risk reduction, project elements, power line route options, plans for communication to the public, and coordination with the City of Piedmont. No conflicts or concerns were communicated to PG&E about the proposed project. PG&E formally requested a position statement in November 2024 but has not yet received a written response.

East Bay Regional Parks District

In January 2020, June 2020, March 2021, July 2021, and October 2024, PG&E met with East Bay Regional Parks District (“EBRPD”) to discuss the project and power line route options, and to request information about project compatibility with land uses and projects. EBRPD expressed an interest in relocating existing towers away from a planned campground area, while noting that realignment may have additional impacts. EBRPD also noted that rebuilding overhead would minimize impact to resources. Beyond balancing impacts to park resources, no other conflicts or concerns were communicated to PG&E for the proposed project.

East Bay Municipal Utility District

In January 2020, June 2020, and October 2024, PG&E met with East Bay Municipal Utility District (“EBMUD”) to discuss the project and, power line route options, and to request information about project compatibility with land use and planned projects. The conversation focused on coordination with EBMUD as the project progressed and erosion and sediment control plans for construction activities. EBMUD supported rebuilding overhead in the existing alignment, as staff thought this would limit impacts to species and habitat. No conflicts or concerns were communicated to PG&E for the proposed project.

V. MEASURES TAKEN TO REDUCE EMF EXPOSURE

GO 131-D, Section X(A) requires PG&E to provide information regarding the measures taken or proposed by PG&E to reduce the potential for exposure to electromagnetic fields (“EMF”) generated by the project. PG&E will employ “no cost” and specified “low cost” measures to reduce public exposure to EMF in accordance with Commission Decision (“D.”) 06-01-042 and PG&E’s “EMF Design Guidelines for Electrical Facilities.” Although the precise measures that will be employed will not be determined until final engineering is completed, the following are examples of measures that may be adopted as required by D. 06-01-042 and the Design Guidelines:

- **Optimal Conductor Phasing.** The rebuilt Moraga–Oakland X 115 kV lines will be configured with optimal phasing to minimize EMF at the right of way boundary.
- **Raising Tower Height.** PG&E will raise the height of approximately thirty-six towers on the rebuilt Moraga–Oakland X 115 kV lines by 10 feet to reduce EMF near residences along the proposed route.
- **Lower Trench Depth.** PG&E will lower the trench depth of the underground Moraga–Oakland X 115 kV lines in school and residential land use areas by approximately 5 feet lower than base design.

- Use Twisted Cable Technology. For the underground portions of the project, PG&E will use XLPE triplex type, twisted cable technology to minimize EMF in the underground sections of the Moraga–Oakland X 115 kV lines.

Once the project is approved by the Commission, a Final EMF Management Plan containing the precise EMF measures to be employed will be prepared for the project and submitted to the CPUC. PG&E’s Preliminary EMF Field Management Plan for the proposed project is attached as Exhibit D.

VI. PUBLIC NOTICE

Pursuant to Section XI(A) of GO 131-D, PG&E will send notice of the Application within ten days after filing the Application to the cities of Orinda, Piedmont, and Oakland; Alameda County Departments of Planning and Public Works; Contra Costa County Departments of Public Works and Building & Planning; the Alameda and Contra Costa County Farm Bureaus; the California Energy Commission; the California Department of Transportation’s District 4 Office and Division of Aeronautics; the Secretary of the California Natural Resources Agency; the CDFW; the California Department of Health Services; the State Water Resources Control Board; the California Air Resources Board; the Bay Area Air Quality Management District; the Water Board; the NAHC; the USFWS; the USACE, San Francisco District Regulatory Division; all owners of land within a minimum of 300 feet of the proposed project (as determined by the most recent local assessor’s parcel roll available to PG&E at the time the notice is sent); and any other interested parties that have requested such notification.

In accordance with Section XI(A)(2), PG&E will publish a notice of the Application within ten days after filing the Application, once a week for two successive weeks, in the East Bay Times newspaper, which covers Contra Costa and Alameda counties. In accordance with Section XI(A)(3), PG&E will also post a notice of the Application on-site and off-site where the proposed project is located. PG&E will deliver a copy of the notice to the CPUC Public Advisor

and the CPUC's Energy Division in accordance with Section XI(A)(3) and will file a declaration of mailing and posting with the Commission within five days after completion.

VII. REQUEST FOR TIMELY ACTION

This maintenance project will reinforce PG&E's electrical transmission system to better enable safe and reliable service the North Oakland area without interruptions or emergency conditions. To enable PG&E to procure materials, secure any necessary secondary permits and property rights, and begin construction by late 2028, PG&E respectfully requests that this Application be approved no later than August 2026.

VIII. EXHIBITS

The following exhibits are attached and incorporated by reference to this Application:

Exhibit A: Project Overview Map

Exhibit B: Proponent's Environmental Assessment

Exhibit C: Preliminary Project Schedule

Exhibit D: Preliminary EMF Field Management Plan

IX. CONCLUSION

PG&E respectfully requests that the Commission:

1. Issue a Decision and Order, effective immediately, granting PG&E a Permit to Construct the Moraga-Oakland X 115 kV Rebuild Project, adopting an appropriate environmental document for the project, and granting any other permission and authority necessary to construct, operate and maintain the project.

2. Authorize Energy Division to approve requests by PG&E for minor project modifications that may be necessary during final engineering and construction of the project so long as Energy Division finds that such minor project modifications would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

3. Grant such other and further relief as the CPUC finds just and reasonable.

Dated in Oakland, California, this 15th day of November, 2024.

Respectfully Submitted,

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SCOPING MEMO INFORMATION

Category:

Ratesetting. Pursuant to Rule 2.1(c) of the Commission's Rules of Practice and Procedure, the application must propose a category for the proceeding as defined in Rule 1.3. If none of the enumerated categories are applicable, proceedings will be categorized under the catch-all "ratesetting" category. (CPUC Rule 7.1 (e)(2).) The Commission has consistently found that applications for CPCNs and PTCs under GO 131-D do not fit within any of the enumerated categories and should therefore be considered as "ratesetting proceedings."

Need for hearing:

The Commission has determined that issues related to project need and cost are not within the scope of PTC applications, leaving only environmental review as a relevant issue. Under Section IX.B(f) of GO 131-D, "an application for a permit to construct need not include either a detailed analysis of purpose and necessity, a detailed estimate of cost and economic analysis, a detailed schedule, or a detailed description of construction methods beyond that required for CEQA compliance." No areas of environmental or other public concern are known. If environmental concerns are raised, those can be addressed in the environmental review process and do not require separate hearings. If other concerns about the Project are raised, PG&E recommends that a public participation hearing be held.

Issues:

None known

Safety Issues:

The project is being constructed, in part, to replace aging structures, which will increase the safety of the existing line. PG&E workers will utilize construction BMPs, standard health and safety procedures, and guard structures to ensure the safety of workers and nearby residents throughout construction. PG&E will also coordinate with any applicable emergency services providers in the event of any road or lane closures associated with construction. PG&E will comply with all FAA and other legal requirements related to helicopter safety. PG&E will prepare a Worker Environmental Awareness Program and will implement hazardous substance control/emergency response and fire risk procedures and will comply with all measures and applicable laws, to address potential hazardous materials, wildfire, and other safety issues. Removed towers will be tested for lead paint and asbestos, and will be disposed of appropriately in accordance with applicable laws.

Proposed Schedule:

See Exhibit C, attached

VERIFICATION

I, Brooke Reilly, hereby declare that I am the Vice President of Land, Environmental, and Permitting Services at Pacific Gas and Electric Company and am authorized to make this verification on behalf of Pacific Gas and Electric Company; that I have read the foregoing:

**APPLICATION OF PACIFIC GAS AND ELECTRIC COMPANY
FOR A PERMIT TO CONSTRUCT THE
MORAGA OAKLAND X 115 KV REBUILD PROJECT**

and that the information related to Pacific Gas and Electric Company set forth therein is true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury pursuant to the laws of the state of California that the foregoing is true and correct.

Executed: November 14, 2024



Brooke Reilly
Vice President

Land, Environmental, and Permitting Services